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11  
12 UNITED STATES DISTRICT COURT  
13  
14 DISTRICT OF NEVADA

15 UNITED STATES OF AMERICA, )  
16 Plaintiff, ) CASE NO. 2:15-CR-00212-JCM-NJK  
17 vs. )  
18 CHARLES PARKIN, )  
19 Defendant. )  
20 \_\_\_\_\_)

21  
22 **STIPULATION TO CONTINUE MOTIONS DEADLINE**  
23 **(First Request)**

24 IT IS HEREBY STIPULATED AND AGREED, between the United States of America,  
25 through its attorneys, DAYLE ELIESON, United States Attorney, and ALEXANDRA M.  
26 MICHAEL, Assistant United States Attorney, and the Defendant, CHARLES PARKIN, through his  
27 counsel, RUSSELL E. MARSH, ESQUIRE, WRIGHT MARSH & LEVY, that the current schedule  
28 for filing and responding to pretrial motions be vacated and extended for one month. This  
stipulation is entered into for the following reasons:

1. By Order of the Court dated November 15, 2018, any pretrial motions are now due  
on December 17, 2018; responses to any motions shall be filed within 14 days from the date of  
service of the motions; and any replies may be filed within 7 days of service of the responses.

2. The parties continue to engage in plea negotiations in an effort to resolve this matter  
without the need for trial or the filing of motions.

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1       3.     AUSA Michael has been occupied with trial in United States v. Brian Wright, Case  
2 No. 2:17-CR-00160-JAD-VCF, which took place in December 2018.

3       4.     The parties agree that the new motions schedule shall be as follows: The parties shall  
4 have until January 17, 2019, to file any pretrial motions and notices of defenses. The parties shall  
5 have 14 days from the service of motions to file any responsive pleadings. Any replies shall be due  
6 within 7 days of service of any responses.

7       5.     This is the parties' first request to continue the motions schedule. Mr. Parkin is not  
8 in custody and agrees with this request.

9           WHEREFORE, the United States of America, and the Defendant, Charles Parkin, request  
10 that the motions schedule be continued for one month as set forth above.

11           DATED: January 7, 2019

12 WRIGHT MARSH & LEVY

14 By /s/ Russell E. Marsh  
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DAYLE ELIESON  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, )  
Plaintiff, ) CASE NO. 2:15-CR-00212-JCM-NJK  
vs. )  
CHARLES PARKIN, )  
Defendant. )  
)  
**ORDER**

Based upon the pending Stipulation of counsel and good cause appearing, the Court hereby grants the joint request and extends the motions schedule as follows: The parties shall have until January 17, 2019, to file any pretrial motions and notices of defenses. The parties shall have 14 days after service of the motions file any responsive pleadings to these motions. Any replies shall be due within 7 days of the service of the responses.

SO ORDERED.

Dated: January 8, 2019.

**JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE**

JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE